UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

WONDERWORK, INC.,

Debtor.

VINCENT A. SAMA, as Litigation Trustee of the WW LITIGATION TRUST,

Plaintiff.

vs.

KPMG LLP,

Defendants.

Chapter 11 Case No. 16-13607 (SMB)

Adv. No. 18-01868-SMB

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME

WHEREAS, on December 21, 2018, Vincent A. Sama, as Litigation Trustee of the WW Litigation Trust, commenced this adversary proceeding against defendant KPMG LLP.

WHEREAS, on January 31, 2019, the Court entered an Order extending the time to February 15, 2019, for KPMG to file a response to the complaint.

WHEREAS, on February 20, 2019, the Court entered an Order further extending the time to March 15, 2019, for KPMG to file a response to the complaint.

WHEREAS, the parties have agreed to participate in a mediation on April 16, 2019, to attempt to resolve this adversary proceeding.

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that the time for KPMG to answer or otherwise respond to the Complaint is further extended to and including April 29, 2019.

KAPLAN LANDAU PLLC

FOLEY HOAG LLP

By: /s/ Mark Landau By: /s/ Lisa C. Wood Mark Landau Lisa C. Wood New York Bar No. 5456900 Amanda Grannis Carnegie Hall Tower 155 Seaport Boulevard 152 West 57th Street, 8th Floor Boston, MA 02210 New York, NY 10019 Tel: (617) 832-1117 Tel: (212) 593-1700 lwood@foleyhoag.com Attorneys for Plaintiff and Vincent Sama, as Trustee of the WW Litigation Trust Foley Hoag LLP 1301 Avenue of the Americas New York, NY 10019 March 15, 2019 Attorneys for Defendant, KPMG LLP IT IS SO ORDERED, this ______ day of ______, 2019.

HONORABLE STUART M. BERNSTEIN UNITED STATES BANKRUPTCY JUDGE

Certificate of Service

I, Lisa C. Wood, certify that on March 15, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification to all counsel of record registered to receive notices of electronic filing.

/s/ Lisa C. Wood